

FILED  
IN CLERK'S OFFICE  
U.S. DISTRICT COURT E.D.N.Y.

★ SEP 24 2020 ★

LONG ISLAND OFFICE

ALB:PP  
F. #2018R01977/OCDETF# NY-NYE-0853

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
----- X

UNITED STATES OF AMERICA

- against -

CHENG ZHANG,  
also known as "Lin Dao,"

Defendant.

----- X

THE GRAND JURY CHARGES:

INDICTMENT

**CR 20 398**  
Cr. No.                       
(T. 21, U.S.C., §§ 841(a)(1),  
841(b)(1)(B)(viii), 853(a) and 853(p);  
T. 18, U.S.C., §§ 2 and 3551 et seq.)

**GARAUFIS, J.**

**SCANLON, M.J.**

DISTRIBUTION AND POSSESSION WITH INTENT TO DISTRIBUTE  
METHAMPHETAMINE

1. In or about and between January 2020 and March 2020, both dates being approximate and inclusive, within the Eastern District of New York, the defendant CHENG ZHANG, also known as "Lin Dao," together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(viii); Title 18, United States Code, Sections 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

2. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged herein, the government will seek forfeiture in accordance with Title 21, United States Code, Section 853(a), which requires any person convicted of such offense to forfeit: (a) any property constituting, or derived from, any proceeds obtained directly or indirectly as the result of such offense, and (b) any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be

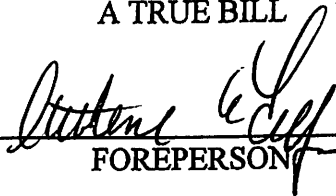
divided without difficulty;

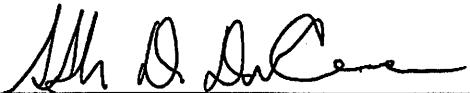
it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p),

to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 21, United States Code, Sections 853(a) and 853(p))

A TRUE BILL

  
FOREPERSON

  
\_\_\_\_\_  
SETH D. DUCHARME  
ACTING UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

F.#: 2018R01977/OCDETF# NY-NYE-0853

FORM DBD-34  
JUN. 85

No. \_\_\_\_\_

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# UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

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THE UNITED STATES OF AMERICA

vs.

CHENG ZHANG, *also known as "Lin Dao,"*

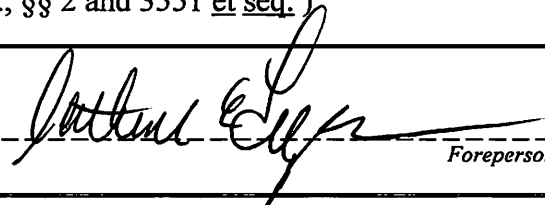
Defendant.

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## INDICTMENT

(T. 21, U.S.C., §§ 841(a)(1), 841(b)(1)(B)(viii), 853(a) and 853(p); T.  
18, U.S.C., §§ 2 and 3551 et seq. )

*A true bill.*



Foreperson

Filed in open court this \_\_\_\_\_ day,

of \_\_\_\_\_ A.D. 20 \_\_\_\_\_

\_\_\_\_\_  
Clerk

Bail, \$ \_\_\_\_\_

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*Philip Pilmar, Assistant U.S. Attorney (718) 254-6106*